Pruhs & Donovan, S.C.

Martin J. Pruhs Christopher D. Donovan 757 North Broadway – 4th Floor Milwaukee, Wisconsin 53202 Tel: (414) 221-1950

Fax: (414) 221-1959

16 June 2014

Honorable Aaron E. Goodstein Federal Courthouse 517 East Wisconsin Avenue Milwaukee, Wisconsin 53202

> Re: Wisconsin Eastern District Case No. 13-CR-155 United States v. Jeffrey Feldman

Your Honor.

We are in receipt of the government's letter filed with the Court today where it asks the Court to find that Mr. Feldman has waived his right to have the Court decide the pretrial motions that were previously filed. As noted in the letter, while no transcript of the hearing the Court held on May 8th, 2014 has been produced, a copy of the audio recording is apparently available for review (and counsel has made arrangements to obtain a copy). Mr. Feldman hereby requests that the Court take no action on the government's request until he and his counsel have time to listen to the audio recording and file any appropriate response.

Additionally, Mr. Feldman notes that he timely complied with the filing of all pretrial motions under Fed. R. Crim. P. 12(e), and regardless, the Court may grant relief under that rule from waiver upon a showing of good cause. Given adequate time, Mr. Feldman can elaborate further why good cause exists in this case if waiver is indeed found by the Court.

/s/ ______Chris Donovan
Robin Shellow
Attorneys for Jeffrey Feldman

CC: Karine Moreno-Taxman via ECF Jeffrey Zeeman via ECF Richard Frohling via ECF